

RELATED CORRESPONDENCE

June 4, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:  
Marshall E. Miller, Chairman  
Gustave A. Linenberger, Jr.  
Dr. Cadet H. Hand, Jr.

In the matter of

UNITED STATES DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

NATURAL RESOURCES DEFENSE COUNCIL, INC.  
AND THE SIERRA CLUB SEVENTH  
REQUEST TO APPLICANTS FOR  
PRODUCTION OF DOCUMENTS

Pursuant to 10 CFR § 2.741, and in accordance with the Board's Prehearing Conference Order of February 11, 1982, Intervenor, Natural Resources Defense Council, Inc. and the Sierra Club, request that Applicants provide at the office of their Counsel in Washington, D.C. copies of the following documents.

REQUESTS FOR DOCUMENTS

Contention 1

1. In 1981-82, a document entitled "Questionnaire for Special Problems in Connection with the Risk Oriented Analysis of the SNR-300" (English translation) was prepared by Hofer, Javeri, Loffler, Maschek, Roysl, and Strowe of Gesellschaft fur Reaktorsicherheit (GRS/bH) and distributed to a number of DOE and NRC employees and consultants. Please produce all responses to such questionnaire in Applicants' possession prepared by the following persons:

- a. R. Avery, ANL
- b. H. K. Fauske, Fauske Associates
- c. D. Ferguson, ANL
- d. G. Fischer, BNL
- e. F. X. Gavigan, DOE
- f. M. F. Kazimi, ACRS consultant
- g. C. N. Kelber, NRC
- h. N. Katzenberg, ACRS consultant
- i. M. Stevenson, Los Alamos
- j. T. G. Theofanous, Purdue University, NRC
- k. J. Walker, Sandia Labs
- l. A. E. Walter, Westinghouse.

2. Letter with attachment, CRBRP to M.R. Denton, "Project Evaluation of the NRC Staff Review of CRBRP, dated March 5, 1979.
3. Letter, D. Clark Gibbs to Mike McCormack, re: breeder reactor technology, dated March 26, 1980.
4. GEAP 13908, "Alternate Shutdown System Selection" (1972).
5. Proceedings of the International ANS/ENS Topical Meeting on Probabilistic Risk Analysis (September 20-24, 1981), Port Chester, NY.
6. H. U. Wider, et al., "Analysis of TREAT Transient Overpower Experiments Using the PLUTO2 Code," LA-7938-C, Specialists Workshop on Predictive Analysis of Material Dynamics in LMFBR Safety Experiments, March 1979.
7. B. W. Lee and S. C. Crick, "Analysis of the ZPPR-5 Critical Experiments - Simulating Hypothetical Core Disruptive Accidents," GEFR-00109, General Electric Co., May 1977.
8. C. E. Dickerman, et al., "Summary of TREAT Experiments on Oxide-Core Disruptive Accidents," ANL/RAS 78-38, Argonne National Laboratory, August 1978.

9. CRBRP-ARD-0185, "Clinch River Breeder Reactor Plant Integrity of Primary and Intermediate Heat Transport System Piping in Containment," October 1977.
10. J. R. Schornhorst, L. E. Strawbridge and P. Bradbury, "Evaluations of CRBRP Thermal Margin Beyond the Design Base," Proceedings of the Third Post-Accident Heat Removal Information Exchange, ANL-78-10, November 2-4, 1977, pp. 317-326.
11. J. C. Reese, "Reactor Vessel Outlet Plenum Transient Thermal Environment Prediction," CRBRP-ARD-0163, December 1977.
12. R. G. Brown, "Assessment of Debris Transport Methods in Horizontal LMFBR Piping for PAHR Conditions," WARD-SR-3045-9, April 1979.
13. J. B. Rivard, "Postaccident Heat Removal: Debris Bed Experiments D-2 and D-3," SAND 78-1238 (NUREG/CR-0421), November 1978.
14. J. A. Hassberger, "Intermediate Scale Sodium-Concrete Reaction Tests," HEDL-TME-77-99, August 1977.
15. R. W. Wierman, "Experimental Study of Hydrogen Jet Ignition and Jet Extinguishment," HEDL-TME 78-80, April 1979.

16. R. D. Peak, "CACECO Code Verification," in Fast Reactor Safety Technical Progress Report, April-June 1977, HEDL-TME-77-67.
17. A. K. Postma and R. K. Hilliard, "Nucleation and Capture of Condensible Airborne Contaminants in an Aqueous Scrubbing System," HEDL-TME 78-82, September 1978.
18. L. Baker, Jr., et al., "Postaccident Heat Removal Technology," ANL/RAS-77-2, Section VII, January 1977.
19. A. K. Postma, J. D. McCormack and J. A. Schur, "A Study of Water and Gas Release from Heated Concrete," HEDL-TC-996, December 1977.
20. R. W. Wierman, L. D. Muhlestein and L. D. Simmons, "Experimental Evaluation of Cell Liners," in R. H. Mallett and B. R. Nair, ed., Coolant Boundary Integrity Considerations in Breeder Reactor Design, PVP-PB-027, pp. 113-131, American Society of Mechanical Engineers, New York, 1978.
21. S. F. Bankert, et al., "Containment Margins in FFTF for Postulated Failure of In-Vessel Post-Accident Heat Removal," HEDL-TME-77-18, April 1977.

22. E. S. Sowa, et al., "Post-Accident Heat Removal: M-Series Molten Core Debris-Sodium Interaction Experiment," ANL/RAS 78-54, December 1978.

Contention 6

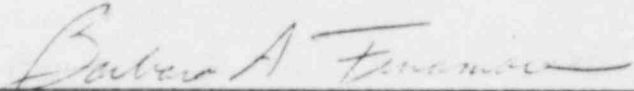
23. All documents identified in response to Interrogatory V-5 (Contention 6) of Intervenor's Eighteenth Set of Interrogatories to Applicant.

24. Argonne National Laboratory, Evaluation of Barnwell Nuclear Fuel Plant (BNFP) (Full Report) December 1980.

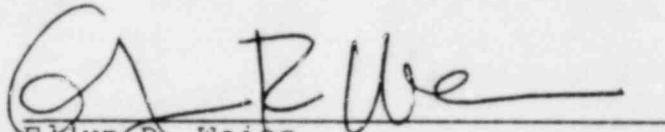
Contention 11

25. "Study of Anticipated Impact on DOE Programs from Proposed Reductions to the External Occupational Radiation Exposure Limit," DOE/EV-0045.

Respectfully submitted,



Barbara A. Finamore  
S. Jacob Scherr  
1725 I Street, N.W., #600  
Washington, D.C. 20006  
(202)223-8210



Eilyn R. Weiss  
Harmon & Weiss  
1725 I Street, N.W.  
Washington, D.C. 20006  
(202)833-9070

Attorneys for Intervenors  
Natural Resources Defense  
Council and Sierra Club

Dated: June 4, 1982

CERTIFICATE OF SERVICE

I hereby certify that copies of NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB TWENTY-FIFTH SET OF INTERROGATORIES TO STAFF, NINETEENTH SET OF INTERROGATORIES TO APPLICANTS, TENTH REQUEST TO STAFF FOR ADMISSIONS, TENTH REQUEST TO APPLICANTS FOR ADMISSIONS, SECOND REQUEST TO STAFF FOR PRODUCTION OF DOCUMENTS, AND SEVENTH REQUEST TO APPLICANTS FOR PRODUCTION OF DOCUMENTS were served this 4th day of June 1982 on the following:

- \* Marshall E. Miller, Esquire  
Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
4350 East West Highway  
Bethesda, Maryland 20814  
(2 copies)
- \* Mr. Gustave A. Linenberger  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
4350 East West Highway  
Bethesda, Maryland 20814
- \* Daniel Swanson, Esquire  
Stuart Treby, Esquire  
Bradley W. Jones, Esquire  
Office Of Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Maryland National Bank Building  
7735 Old Georgetown Road  
Bethesda, Maryland 20814
- \* Atomic Safety & Licensing Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555
- \* Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555
- \* Docketing & Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
(3 copies)



\* R. Tenney Johnson, Esquire  
Leon Silverstrom, Esquire  
Warren E. Bergoholz, Jr., Esquire  
Michael D. Oldak, Esquire  
L. Dow Davis, Esquire  
Office of General Counsel  
U.S. Department of Energy  
1000 Independence Ave., S.W.  
Washington, D.C. 20585

\* George L. Edgar, Esquire  
Irvin N. Shapell, Esquire  
Thomas A. Schmutz, Esquire  
Gregg A. Day, Esquire  
Frank K. Peterson, Esquire  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, D.C. 20036

Dr. Cadet H. Hand, Jr.  
Director  
Bodega Marine Laboratory  
University of California  
P.O. Box 247  
Bodega Bay, California 94923

Herbert S. Sanger, Jr., Esquire  
Lewis E. Wallace, Esquire  
James F. Burger, Esquire  
W. Walker LaRoche, Esquire  
Edward J. Vigluicci, Esq.  
Office of the General Counsel  
Tennessee Valley Authority  
400 Commerce Avenue  
Knoxville, Tennessee 37902

William M. Leech, Jr., Esquire  
Attorney General  
William B. Hubbard, Esquire  
Chief Deputy Attorney General  
Lee Breckenridge, Esquire  
Assistant Attorney General  
State of Tennessee  
Office of the Attorney General  
450 James Robertson Parkway  
Nashville, Tennessee 37219

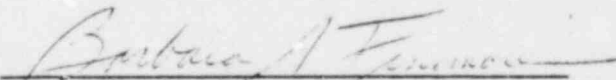
Lawson McGhee Public Library  
500 West Church Street  
Knoxville, Tennessee 37902

William E. Lantrip, Esquire  
City Attorney  
Municipal Building  
P.O. Box 1  
Oak Ridge, Tennessee 37830

Oak Ridge Public Library  
Civic Center  
Oak Ridge, Tennessee 37820

Mr. Joe H. Walker  
401 Roane Street  
Harriman, Tennessee 37748

Commissioner James Cotham  
Tennessee Department of Economic  
and Community Development  
Andrew Jackson Building, Suite 1007  
Nashville, Tennessee 32219

  
Barbara A. Finamore

\* Denotes hand delivery.